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16 UNITED STATES DISTRICT COURT
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18 NORTHERN DISTRICT OF CALIFORNIA
19

20 AUDLEY BARRINGTON LYON, JR., et. al.,

21 Plaintiffs,

22 v.

23 UNITED STATES IMMIGRATION AND
24 CUSTOMS ENFORCEMENT, et al.,

25 Defendants.

Case No.: 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
SCHEDULE AND PAGE LIMITS FOR
BRIEFING ON CROSS MOTIONS FOR
SUMMARY JUDGMENT; ~~PROPOSED~~
ORDER**

CLASS ACTION

The parties to this action hereby file this Joint Stipulation for an order to set the briefing schedule and to seek expanded page limits for the parties' cross motions for summary judgment.

The parties seek leave of court to file expanded briefs in this matter for the following reasons:

- The case is factually complex. The claims are brought on behalf of a plaintiff class of several hundred people who are housed at four separate facilities. The claims relate to telephone access provided to immigration detainees at those facilities, which are served by three different telephone companies. In addition, the operative facts have changed over the course of litigation.
- The case is legally complex. Plaintiffs are challenging the adequacy of telephone access provided by Defendants under statutory and constitutional provisions that have not previously been applied to similar facts.
- The parties will seek partial summary judgment based on cross motions and will present four rather than six briefs to the court. Because the Defendants' opening motion and opposition and Plaintiffs' opposition and reply, respectively, will be combined, and because of the complex facts and law presented, the parties' ability to present the issues thoroughly to the Court would be constrained if limited to the typical page limitations.

Accordingly, the Parties propose the following briefing schedule and page limits:

Plaintiffs' Motion for Partial Summary Judgment	40 pages	December 16, 2015
Defendants' Opposition and Cross Motion for Summary Judgment	50 pages	January 5, 2016
Plaintiffs' Opposition and Reply	30 pages	January 21, 2016
Defendants' Reply	20 pages	January 28, 2016
Court Hearing on Cross Motions for Summary Judgment		February 11, 2016

1 Dated: November 25, 2015

Respectfully submitted,

2 ORRICK, HERRINGTON & SUTCLIFFE LLP

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[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 11/25/15

HON. EDWARD M. CHEN
United States District Judge



CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2015, a true and correct copy of the foregoing
JOINT STIPULATION REGARDING SCHEDULE AND PAGE LIMITS FOR BRIEFING ON
CROSS MOTIONS FOR SUMMARY JUDGMENT; [PROPOSED] ORDER was served with
the Clerk of the Court by using the CM/ECF system, which provided an electronic notice and
electronic link of the same to all attorneys of record through the Court's CM/ECF system.

Dated: November 25, 2015

By: /s/ Robert P. Varian
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